

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION**

MELVIN INGRAM; SHANTEL ADAMS; DAVID
BECK; DWAYNE BOWENS; ALFREDO
CARDENAS; VERONICA CLEAVES; MARCUS
COCHRAN; ROBERT COLUCCI; LESLIE CREWS;
ERIC FLAKE; JACOB GREENWELL; LAWONDA
HODGES; LAROME HUMPHREY; ROBERT
KATALTEPE; JOHN LINTNER; KEESHA
MCCLINTON; LAKISHA MCCOY; CLIFTON
MCCOY; DEDRECK MCVAY; HARRY OLIVER;
DARRELL ONSBY; FREDERICK RAYFORD;
JOHN RILES; ASHLEY ROBERTSON; DEANDRE
ROSSER; DUSTIN RUSSELL; PATRICK SHAW;
CEDRIC TAYLOR; JESSE TOWNSEND; AND
STEVEN WESBY, Individually and as Potential Class
Representatives for All Similarly Situated Claimants,

Plaintiffs,

v.

BILL OLDHAM, in his individual capacity and in his
official capacity as the Sheriff of Shelby County,
Tennessee; ROBERT MOORE, in his individual
capacity and in his official capacity as the Jail Director
of Shelby County, Tennessee; CHARLENE
MCGHEE, in her individual capacity and in her
official capacity as the Assistant Chief of Jail Security
of Shelby County, Tennessee; DEBRA HAMMONS,
in her individual capacity and in her official capacity
as the Assistant Chief of Jail Programs of Shelby
County, Tennessee; SHELBY COUNTY,
TENNESSEE, a Tennessee municipality; and TYLER
TECHNOLOGIES, INC., a foreign corporation,

Defendants.

**Civil Action No. 2:17-cv-02795-SHM-
tmp**

(Hon. Judge Samuel H. Mays)

**DEFENDANTS BILL OLDHAM, ROBERT MOORE, CHARLENE MCGHEE, SHELBY
COUNTY, TENNESSEE’S UNOPPOSED MOTION TO EXTEND TIME TO RESPOND**

Defendants Bill Oldham, Robert Moore, Charlene McGhee, Shelby County, Tennessee

(“Shelby County Defendants”) file its Unopposed Motion to Extend Time to Respond, stating:

1. On October 31, 2017, above-named plaintiffs filed their Class Action Complaint (“Complaint”). The Shelby County defendants were served with the Complaint on November 21, 2017.

2. The deadline to respond to the Complaint is December 12, 2017.

3. In light of the holiday season, Plaintiffs’ have no objection to an extension for the Shelby County Defendants to respond to the Complaint. The parties have agreed to Monday, January 8, 2018 as the extended deadline for the Shelby County Defendants to respond to the Complaint, subject to the Court’s approval.

4. The parties do not oppose this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendants Bill Oldham, Robert Moore, Charlene McGhee, Shelby County, Tennessee respectfully request that the Court extend the subject response deadline to Monday, January 8, 2018.

Respectfully submitted,

/s/ Odell Horton, Jr.

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Counsel for Shelby County Defendants

CERTIFICATE OF CONSULTATION

On November 30, 2017, the counsel for the parties conferred via e-mail regarding the matters set forth in this Motion. On the same day, Steve Wilson, counsel for Plaintiffs, agreed to the Shelby County Defendants' request for an extension via e-mail. The parties do not oppose this Motion.

/s/ Odell Horton, Jr.

CERTIFICATE OF SERVICE

The undersigned certifies that on December 1, 2017, a true and correct copy of the foregoing has been served upon the following counsel, via the Court's ECF filing system:

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/s/ Odell Horton, Jr.

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